

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

MICHAEL WYMAN,)
)
)
 Plaintiff,)
)
)
)
v.) Civil Action No.: 1:24-cv-11450-BEM
)
NEW ERA TECHNOLOGY, INC.,)
)
 Defendant.)
)
)

**DEFENDANT NEW ERA TECHNOLOGY, INC.'S
MOTION FOR SUMMARY JUDGMENT**

Defendant New Era Technology, Inc. (“New Era”) hereby moves for summary judgment, pursuant to Fed. R. Civ. P. 56, as to all counts of Plaintiff Michael Wyman’s Complaint. New Era is entitled to summary judgment because there is no genuine dispute as to any material fact and New Era is therefore entitled to judgment as a matter of law.

New Era incorporates its Memorandum of Law, Local Rule 56.1 Statement of Material Facts Not in Dispute, and Declaration in Support of its Motion for Summary Judgment (with exhibits) into this Motion.

WHEREFORE, New Era respectfully requests that the Court grant this Motion, enter summary judgment for New Era, and dismiss all counts of Plaintiff’s Complaint with prejudice.

Certification of Compliance with Local Rule 7.1

Pursuant to Local Rule 7.1(a)(2), counsel for New Era hereby certifies that on August 4, 2025, they conferred with counsel for Plaintiff in a good faith but unsuccessful attempt to resolve and/or narrow the issues raised herein.

Request for Oral Argument

Pursuant to Local Rule 7.1(d), New Era respectfully requests a hearing on its Motion for Summary Judgment.

Respectfully submitted,

NEW ERA TECHNOLOGY, INC.,

By its attorneys,

/s/ Justin L. Engel

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Dated: August 6, 2025

CERTIFICATE OF SERVICE

I, Justin L. Engel, hereby certify that, on August 6, 2025, this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Justin L. Engel

Justin L. Engel